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April 11, 2024

**BY ECF:**

Honorable Allyne R. Ross  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

RE: United States v. Zhibin Lai  
Case No.: 23-cr-00246- 1 (ARR)  
Letter Motion Seeking Temporary Modification of Release  
Conditions

Dear Judge Ross:

Please be advised that I represent **Zhibin Lai** in the above captioned action.

Mr. Lai is currently subject to release conditions as per Your Honor's June 27, 2023 (ECF No.: 8) Order, Mr. Lai cannot leave New York State and New Jersey except for travel to and from court.

We respectfully submit this letter requesting a one time temporary modification of Mr. Lai release conditions.

Mr. Lai seeks permission from the court to travel outside of New York State and New Jersey for two separate trips. The trips he would like to attend are:

1. April 25, 2024 through April 26, 2024 to Perryville, MD. Mr. Lai will be staying at the Great Wolf Lodge Water Park.
2. May 24, 2024 through May 27, 2024 to Gouldsboro, PA. Mr. Lai will be staying at an Airbnb.

All other restrictions on Mr. Lai will remain in place throughout the duration of these trips. His temporary modification will terminate on April 27, 2024, and then again on May 28, 2024.

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Neither Pretrial Services nor the Government has any objection to the requested modification.

Thank you in advance for your attention to this matter.

Sincerely,

**Spodek Law Group P.C.**

/s/ Todd A. Spodek

Todd A. Spodek

cc: All Counsel of Record (By ECF).  
PSO Colton Craft (By Email).